

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF
PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY DFC/USPS-2 OF DOUGLAS F. CARLSON
(October 22, 2001)

The United States Postal Service hereby moves for late acceptance of its partial objection to interrogatory DFC/USPS-2, filed September 28, 2001. As discussed in its Notice of Review of Responses to Interrogatories DFC/USPS-1-2, filed October 12, 2001, the Postal Service discovered a day after filing its response that the response was based on an incomplete list of Office of Inspector General audit reports.¹ The objection is being filed nine business days late, but as soon as possible after Postal Service counsel obtained the complete list, as well as potentially responsive reports, and completed a review of these reports and discussions with postal and OIG officials. Given that the discovery period has over a month remaining, the Postal Service

¹This possibility came to the attention of Postal Service counsel based on an email message from Douglas F. Carlson, received October 12, that identified an audit report of which Postal Service counsel was unaware. Further checking led to the determination that Postal Service counsel had an incomplete list of OIG audit reports.

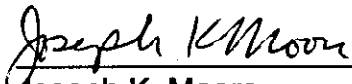
believes that other participants will not be prejudiced by this late objection.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Joseph K. Moore

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Joseph K. Moore

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